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UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA GOODMAN
IN SUPPORT OF PLAINTIFF WAYMO'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS RENEWED MOTION IN
LIMINE NO. 1 (DKT. 1561)**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

I, Martha L. Goodman, declare as follows:

1. I am an associate at the law firm Boies Schiller Flexner LLP representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in good standing of the Bar of the District of Columbia. I make this declaration in support of Plaintiff’s Administrative Motion to File Under Seal Its Motion in Limine No. 17 (Dkt. 1561). I make this declaration based on personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein.

2. I have reviewed the following documents and confirm that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Waymo’s Renewed Motion in Limine No. 1	Red-outline box
Exhibit A to the Nardinelli Declaration ISO Waymo’s Renewed Motion in Limine No. 1	Red-outline box
Exhibit B to the Nardinelli Declaration ISO Waymo’s Renewed Motion in Limine No. 1	Red-outline box
Exhibit G to the Nardinelli Declaration ISO Waymo’s Renewed Motion in Limine No. 1	Red-outline box
Exhibit 28 to the Goodman Declaration ISO Defendants’ Opposition to Waymo’s Renewed Motion in Limine No. 1	Red-outline box
Exhibit 35 to the Goodman Declaration ISO Defendants’ Opposition to Waymo’s Renewed Motion in Limine No. 1	Red-outline box
Exhibit 36 to the Goodman Declaration ISO Defendants’ Opposition to Waymo’s Renewed Motion in Limine No. 1	Red-outline box
Exhibit 38 to the Goodman Declaration ISO Defendants’ Opposition to Waymo’s Renewed Motion in Limine No. 1	Red-outline box

3. The red-outlined boxed portions of Exhibit B to the Nardinelli declaration contains confidential or highly confidential information regarding Uber’s LiDAR development. This information is not publicly known, and its confidentiality is strictly maintained. Disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into Uber’s internal development of LiDAR and plans for further development, which would allow competitors to

1 understand Uber's LiDAR development, and allow them to tailor their own strategy. If such
 2 information were made public, Uber's competitive standing could be significantly harmed. Other red-
 3 outlined boxed portions of Exhibit B to the Nardinelli declaration contain Uber employee names, the
 4 disclosure of which would threaten the privacy of individuals at a company that is currently the subject
 5 of extensive media coverage

6 4. The red-outlined boxed portions of Waymo's Renewed MIL No. 1, Exhibits A and G to
 7 the Nardinelli declaration and the red-outlined boxed portions of Exhibits 28, 35, 36, and 38 to the
 8 Goodman declaration contain Uber employee names and confidential email addresses and contact
 9 information, the disclosure of which would threaten the privacy of individuals at a company that is
 10 currently the subject of extensive media coverage.

11 5. Defendants' request to seal is narrowly tailored to those portions of Waymo's Renewed
 12 MIL No. 1, and Exhibits A, B, G, 28, 35, 36, and 38 that merit sealing.

13 6. Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the highlighted
 14 versions documents at issue, with accompanying chamber copies.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is true
 16 and correct. Executed this 18th day of September, 2017, in Washington, DC.

17
 18 /s/ Martha L. Goodman

19 Martha L. Goodman

20
 21 **ATTESTATION OF E-FILED SIGNATURE**

22 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this
 23 Declaration. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman has
 24 concurred in this filing.

25
 26 /s/ Karen L. Dunn

27 Karen L. Dunn